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Comments on Ecotrust Socioeconomic Study for the Central Coast Study Region

This data is watered down and superficial. It does not correctly represent the importance of specific areas to individual fisheries for individual ports. As a result, the results show trends but do not weigh issues appropriately causing one to think the fisherman will have minor impacts of 20 - 30% reductions when in fact many of the packages affect over 50% of fishing habitat for certain fisheries for certain ports. An example of this is the Bolina fishery in the southern aspect of the CCSR. Packages 2R, 3R and S take in most (~80-90%) of this deep water fishery near Purisma and Arguello yet the report gives them only a 34% impact. Another is the nearshore live fishery. Packages 2R, 3R and S take in a large portion (~75%) of all the prime fishing reefs out of Morro Bay and Avila and leave the fleet with small reefs and sand yet their impact is less than 30% for those packages for those fish. Another is the spot prawn fishery. Packages 2R, 3R, and S take in several (60%) of the main canyons from Big Sur to Lopez used to fish this fishery yet their impact is 21%.

The data is not comprehensive. It does not include Commercial Passenger Fishing Vessel data but includes boat rental data. There isn't even any boats rented for fishing in Morro Bay or Avila. The private boat vessels comprise of many out of town fisherman and many that fish close to port. By excluding the CPFV data it also does not demonstrate the importance of that industry to the individual infrastructures of each port. In fact, it really does not demonstrate at all the importance of various fisheries to different ports. For example, Morro Bay does not rely on squid and sardine landings nearly as much as Monterey. And Monterey does not rely on the nearshore live fishery (specifically cabezon, greenling, grass bass, gopher cod and bolina) as much as Morro Bay and Avila. Impacts on these fisheries will have different impacts in different ports. The percent of revenue on their chart should have been divided by port.

The concept of Total Fishing Grounds that Ecotrust uses needs to be qualified to demonstrate that not all fishing grounds are accessible to all fisherman. For example, many of the small vessel fleet have a smaller range they can safely travel and some of the fishing grounds are in areas that have hazardous conditions for the type of gear, vessel used etc. As a result, this also waters down her results. For example, it reports that only 7% of the Total Fishing Grounds for spot prawn fishing would be taken in Packages 2R, 3R and S, but for the trap fisherman in Morro Bay there is no other area besides Julia Pfeiffers down to Lopez inside state waters to safely travel and use traps. The Carmel Canyons are too far and the Canyons off Arguello are too rough for smaller trap vessels. This is just one example of many. Another is the fact that it does not include other regulatory closures in the equation. ie. RCA, no trawl zones, etc. There is also no data on the adaptive ability of fisherman to shift their effort to other areas and the result of placing several fisherman in small areas.

They note "19" Commercial fisheries yet many of them are of little importance to the CCRS. For example, anchovy and white sea bass. This wouldn't matter but it gives Package S credit for not impacting these fisheries that are nearly nonexistent anyways. Ecotrust also separates out the individual fish that are part of one fishery. For example, the shallow nearshore live fishery is mainly cabezon, greenling, gopher cod and grass bass and should be analyzed together. This matters because when you take the impacts as a whole to this fishery the impacts are much more extreme than when they are separated out.

Even the Ecotrust staff admits that they had insufficient time and resources to do a good job. We believe that it is vital information for making an appropriate decision of this magnitude.

The fisherman tried to be involved as much as possible with the process to help explain the importance of their fisheries and the important areas for them to be able to maintain a viable industry. The fishermen lost 1000's of dollars attending meetings to assure the process understood this and worked with Ecotrust with the understanding that she would be communicating accurately the socioeconomics of our study region. This data came out so late in the process and needed so much more work to be appropriate, that the data was admittedly not given much attention in the process. We think that this is very unfair to our industry and a significant reason why the commission should call for a more comprehensive socioeconomic study before making a decision on MPA's.

Thanks for your attention to this matter, Tom and Sheri Hafer